IN THE UNITED SATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

SINGLETARY CONSTRUCTION, LLC

Plaintiff

v.

Docket No. 3:17-0374

REDA HOME BUILDERS, INC.,
RICK REDA and RAE GLEASON

Defendant

ANSWER OF REDA HOME BUILDERS, INC., AND RICK REDA

Come the Defendant's, Rick Reda and Rick Reda Home Builders, Inc., and in response to a complaint for Copyright Infringement, would show unto this Honorable Court as follows:

I. PARTIES

1. It is believed that the Plaintiff is a contractor with its principal place of business in Clarksville, Tennessee, however, it is unknown in what capacity the business entity has been established, therefore, same is denied.
2. Admitted;
3. It is admitted that Rick Reda is a resident of and domiciled in Montgomery County, Tennessee, however, Reda Home Builders, Inc. is incorporated and operates as such, therefore, it is denied that Rick Reda is individually responsible or liable for Rick Reda Home Builders, Inc.;
4. It is believed that Rae Gleason conducts business in Clarksville, Tennessee, however, these Defendants do not have sufficient information to either admit or deny, therefore, same is denied.

II. JURISDICTION AND VENUE

5. Admitted.

6. Admitted.

7. Admitted.

8. Admitted.

III. FACTS

9. These Defendants do not have sufficient information to either admit or deny, therefore, same is denied;

10. These Defendants do not have sufficient information to either admit or deny, therefore, same is denied;

11. These Defendants do not have sufficient information to either admit or deny, therefore, same is denied;

12. These Defendants do not have sufficient information to either admit or deny, therefore, same is denied;

13. These Defendants do not have sufficient information to either admit or deny, therefore, same is denied;

14. These Defendants do not have sufficient information to either admit or deny, therefore, same is denied;

15. These Defendants do not have sufficient information to either admit or deny, therefore, same is denied;

16. Admitted.

17. Admitted.

18. Denied and strict proof is demanded.

19. Denied and strict proof is demanded.

20. Admitted.

21. Denied and strict proof is demanded.

22. Denied and strict proof is demanded.

23. Denied and strict proof is demanded.

24. Denied and strict proof is demanded.

25. Denied and strict proof is demanded.

26. Denied and strict proof is demanded.

27. Denied and strict proof is demanded.

28. Denied and strict proof is demanded.

29. Admitted.

30. It is denied the house is infringing, but admitted as to the address.

IV. CAUSE OF ACTION FOR COPYRIGHT INFRINGEMENT

31. These Defendants adopt the answers previously set out above;

32. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

33. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

34. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

35. Denied and strict proof is demanded.

36. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

37. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

38. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

39. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

40. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

41. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

42. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

43. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

44. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

45. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

46. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

47. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

48. These Defendants do not have sufficient information to ether admit or deny,

therefore, same is denied.

49. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

50. These Defendants do not have sufficient information to ether admit or deny, therefore, same is denied.

Any and all allegations not heretofore specifically admitted or denied is hereby generally denied.

Now having fully answered the complaint filed against them, these defendants would state that the Plaintiff is not entitled to the relief sought in their prayers for relief and this complaint should be dismissed with costs taxed to the Plaintiff's for which execution may issue.

AFFIRMATIVE DEFENSES

Come the Defendants and submit the following Affirmative Defenses:

1. The Complaint fails to state a claim for which relief can be granted.
2. At all times herein, Rick Reda was acting on behalf of Rick Reda Home Builders, Inc., and cannot be held personally liable simply because it is alleged that he is the owner;
3. These Defendants reserve the right to amend this answer after further discovery and investigation.

Respectfully,

s/Sheri S. Phillips

Sheri S. Phillips, BPR#19540
Attorney for Defendant
105 South Third Street
Clarksville, Tennessee 37040
931-647-0200

Certificate of Service

I, Sheri S. Phillips, hereby certify that a copy of the foregoing Answer has been delivered to Stephen J. Zralek, 511 Union Street, Suite 1600, Nashville, Tennessee 37219 on this the 23rd day of March, 2017.

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s/Sheri S. Phillips